

EXHIBIT A

From: Kimberly Anderson <Kimberly.Anderson@robbinsfirm.com>
Sent: Thursday, July 11, 2019 3:46 PM
To: Cross, David D.
Cc: Vincent Russo; Bryan Tyson; Conaway, Jenna B.; Bryan Jacoutot; kaye.burwell@fultoncountyga.gov; cheryl.ringer@fultoncountyga.gov; david.lowman@fultoncountyga.gov; cichter@ichterdavis.com; bbrown@brucepbrownlaw.com; jpowers@lawyerscommittee.org; william@nhphlaw.com; mmurray@altber.com; sleyton@altber.com; sberzon@altber.com; jonlschwartz@mac.com; rabney@lawyerworks.com; ram@lawram.com; dbrody@lawyerscommittee.org; Retha Meier; Kim Bunch; Josh Belinfante; Carey Miller; Alexander Denton; Brian Lake; Halsey G. Knapp; Adam M. Sparks; Manoso, Robert W.; Chapple, Catherine L.; Bentrott, Jane P.; Miriyala, Arvind S.; Brimer, Marcie; Ali, Reema Shocair; Tepfer, Cameron A.
Subject: RE: Shamos

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Given that the purpose of the deposition would be to preserve his testimony, we will issue the notice.

And confirmed.

Kimberly K. Anderson | 404.856.3265 | [ROBBINS](#)

From: Cross, David D. [mailto:DCross@mofo.com]
Sent: Thursday, July 11, 2019 3:37 PM
To: Kimberly Anderson <Kimberly.Anderson@robbinsfirm.com>
Cc: Vincent Russo <vrusso@robbinsfirm.com>; Bryan Tyson <btyson@taylorenghish.com>; Conaway, Jenna B. <JConaway@mofo.com>; Bryan Jacoutot <bjacoutot@taylorenghish.com>; kaye.burwell@fultoncountyga.gov; cheryl.ringer@fultoncountyga.gov; david.lowman@fultoncountyga.gov; cichter@ichterdavis.com; bbrown@brucepbrownlaw.com; jpowers@lawyerscommittee.org; william@nhphlaw.com; mmurray@altber.com; sleyton@altber.com; sberzon@altber.com; jonlschwartz@mac.com; rabney@lawyerworks.com; ram@lawram.com; dbrody@lawyerscommittee.org; Retha Meier <Retha.Meier@robbinsfirm.com>; Kim Bunch <Kim.Bunch@robbinsfirm.com>; Josh Belinfante <Josh.Belinfante@robbinsfirm.com>; Carey Miller <carey.miller@robbinsfirm.com>; Alexander Denton <Alexander.Denton@robbinsfirm.com>; Brian Lake <Brian.Lake@robbinsfirm.com>; Halsey G. Knapp <hknapp@khlawfirm.com>; Adam M. Sparks <sparks@khlawfirm.com>; Manoso, Robert W. <RManoso@mofo.com>; Chapple, Catherine L. <CChapple@mofo.com>; Bentrott, Jane P. <JBentrott@mofo.com>; Miriyala, Arvind S. <AMiriyala@mofo.com>; Brimer, Marcie <MBrimer@mofo.com>; Ali, Reema Shocair <RAli@mofo.com>; Tepfer, Cameron A. <CTepfer@mofo.com>
Subject: RE: Shamos

Without waiving any rights or objections, we'll proceed with his deposition next Friday, July 19, in Atlanta. We'll send a deposition notice.

Please confirm we'll have all documents he relied on for his testimony no later than COB, Monday, July 15. And please produce them on a rolling basis between now and then if at all possible.

We continue to oppose any extension or alteration of the hearing schedule.

Thanks.

DC

From: Kimberly Anderson <Kimberly.Anderson@robbinsfirm.com>

Date: Thursday, Jul 11, 2019, 11:15 AM

To: Cross, David D. <DCross@mofo.com>

Cc: Vincent Russo <vrusso@robbinsfirm.com>, Bryan Tyson <btyson@taylorenglish.com>, Conaway, Jenna B. <JConaway@mofo.com>, Bryan Jacoutot <bjacoutot@taylorenglish.com>, kaye.burwell@fultoncountyga.gov <kaye.burwell@fultoncountyga.gov>, cheryl.ringer@fultoncountyga.gov <cheryl.ringer@fultoncountyga.gov>, david.lowman@fultoncountyga.gov <david.lowman@fultoncountyga.gov>, cichter@ichterdavis.com <cichter@ichterdavis.com>, bbrown@brucepbrownlaw.com <bbrown@brucepbrownlaw.com>, jpowers@lawyerscommittee.org <jpowers@lawyerscommittee.org>, william@nhphlaw.com <william@nhphlaw.com>, mmurray@altber.com <mmurray@altber.com>, sleyton@altber.com <sleyton@altber.com>, sberzon@altber.com <sberzon@altber.com>, jonlschwartz@mac.com <jonlschwartz@mac.com>, rabney@lawyerworks.com <rabney@lawyerworks.com>, ram@lawram.com <ram@lawram.com>, dbrody@lawyerscommittee.org <dbrody@lawyerscommittee.org>, Retha Meier <Retha.Meier@robbinsfirm.com>, Kim Bunch <Kim.Bunch@robbinsfirm.com>, Josh Belinfante <Josh.Belinfante@robbinsfirm.com>, Carey Miller <carey.miller@robbinsfirm.com>, Alexander Denton <Alexander.Denton@robbinsfirm.com>, Brian Lake <Brian.Lake@robbinsfirm.com>, Halsey G. Knapp <hknapp@khlawfirm.com>, Adam M. Sparks <sparks@khlawfirm.com>, Manoso, Robert W. <RManoso@mofo.com>, Chapple, Catherine L. <CChapple@mofo.com>, Bentrott, Jane P. <JBentrott@mofo.com>, Miriyala, Arvind S. <AMiriyala@mofo.com>, Brimer, Marcie <MBrimer@mofo.com>, Ali, Reema Shocair <RAli@mofo.com>, Tepfer, Cameron A. <CTepfer@mofo.com>

Subject: Re: Shamos

- External Email -

At this point- he's available next Friday, July 19. He has agreed to come to Atlanta.

On Jul 11, 2019, at 2:12 PM, Cross, David D. <DCross@mofo.com> wrote:

Vincent -

What are all the dates he's available for deposition between now and the hearing? And do I understand correctly he'll insist on doing this in PA?

Thanks.

DC

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